

BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

July 31, 2001

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed is BellSouth's Operations Support Systems Regionality Filing. This filing replaces the filing made by BellSouth on June 21, 2001. The filing is comprised of the testimony and exhibits of the following BellSouth witnesses:

Ken L. Ainsworth
David A. Coon
Alfred Heartley

Ronald M. Pate
David P. Scollard

The testimony and exhibits of Messrs. Ainsworth and Heartley are unchanged. The testimony and exhibits of Messrs. Coon, Pate and Scollard have been supplemented since the June 21 filing. The reports of PriceWaterhouseCoopers are attached to Mr. Pate's testimony.

Pursuant to Authority Rule 1220-1-1-.03(4), an original and four paper copies of the testimony and exhibits is enclosed. One electronic copy on CD ROM is also enclosed. Electronic copies are being provided to counsel of record for all known parties.

Thank you for your attention to this matter.

Very truly yours,



Guy M. Hicks

GMH/ch

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James P. Lamoureux
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

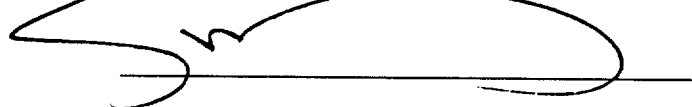
Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Terry Monroe
Competitive Telecom Assoc.
1900 M St., NW, #800
Washington, DC 20036



1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF DAVID A. COON
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO. 01-00362
5 July 31, 2001
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS
9 ADDRESS.
10

11 A. My name is David A. Coon. I am employed by BellSouth as Director –
12 Interconnection Services for the nine-state BellSouth region. My business
13 address is 675 West Peachtree Street, Atlanta, Georgia 30375.
14

15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND
16 EXPERIENCE.
17

18 My career at BellSouth spans over 21 years and includes positions in Network,
19 Regulatory, Finance, Corporate Planning, Small Business Services and
20 Interconnection Operations. Prior to my BellSouth employment, I performed a
21 variety of functions in the Network, Regulatory and Marketing Support
22 organizations of C&P Telephone Company-Washington. I have extensive
23 experience in the development and use of quantitative measurements and
24 results including the establishment, analysis and monitoring of BellSouth process
25 measures.

1 I received a Bachelors Degree in Civil Engineering from Ohio University and a
2 Masters Degree in Engineering Administration from George Washington
3 University. I received the Certified Management Accountant (CMA) designation
4 in 1996 from the Institute of Management Accountants.

5
6 ***I. EXECUTIVE SUMMARY***

7
8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9
10 A. The purpose of my testimony is to respond to several of the “not satisfied” and
11 “not complete” items from the third party test conducted in Georgia by KPMG.
12 Mr. Pate describes how that test was favorable for BellSouth, and responds to
13 the “not satisfied” items that I do not address.

14
15 My testimony shows that certain KPMG findings in the Georgia test that I address
16 do not materially impact a Competitive Local Exchange Carrier’s (CLEC) ability to
17 compete in Tennessee.

18
19 Q. HOW MANY TESTS WERE CONDUCTED BY KPMG? OF THOSE TESTS,
20 HOW MANY WERE PASSED?

21
22 A. KPMG performed 1171 tests. Twenty-One of these tests were identified as “not
23 satisfied” and 11 were rated “not complete” by KPMG. The remaining 1139 (over
24 97%) were either satisfied or it was determined that no report was required.

1 Q. PLEASE PUT THE REMAINDER OF YOUR TESTIMONY IN PERSPECTIVE.

2
3 A. The remainder of my testimony provides detailed results of analyses conducted
4 by BellSouth on the results of KPMG's test criteria from Georgia that are "not
5 satisfied" or "not complete" in the final report. When reviewing these analyses, it
6 is critical to remember that the test criteria discussed herein are only dealing with
7 a small fraction of the test criteria that KPMG analyzed. The overwhelming
8 majority of KPMG's criteria were satisfied in the test. As described in Mr. Pate's
9 testimony, 1171 tests were conducted by KPMG. Of these tests, only 21 (less
10 than 2%) were identified as "not satisfied." KPMG did not complete work on 11
11 tests so they were rated "not complete" by KPMG. Work continues on these
12 criteria and they should ultimately fall into either the satisfied or not satisfied
13 classification. All of the remaining 1139 criteria (over 97%) were either satisfied
14 or KPMG determined that no report was required. When reviewing the detail in
15 my testimony, please do not be misled into believing the number of problems
16 was large. Mr. Pate describes the test conducted by KPMG in his testimony so I
17 will not repeat that explanation here.

18
19 Q. WHICH "NOT SATISFIED" ITEMS FROM THE GEORGIA THIRD PARTY TEST
20 DO YOU ADDRESS?

21
22 A. The "not satisfied" items that I address are:

- 23 • Timeliness of Functional Acknowledgement – EDI
- 24 • Timeliness of Rejects and Clarifications – EDI
- 25 • Timeliness of Firm Order Confirmations
- 26 • Accuracy and Timeliness of Partially Mechanized Orders, and

- Expected Responses – ADSL – Manual

The remaining “not satisfied” items, other than the four associated with metrics, are addressed by Mr. Pate.

Q. WHAT IS A “NOT SATISFIED” CRITERIA IN THE THIRD PARTY TEST?

A. When KPMG personnel performed their testing, they retested items that did not initially pass their test criteria until the item 1) either passed the criteria, 2) the test was determined not necessary, or 3) the test was closed. At the close of the test any items that had not passed KPMG’s test criteria, and for which no further testing was planned, were labeled “not satisfied” by KPMG. Where the Georgia Public Service Commission (GPSC) established standards for a particular measurement, KPMG used that standard to determine whether the test criteria were satisfied or not. Where no GPSC standard existed, KPMG established its own standard.

Q. PLEASE DESCRIBE THE TEST THAT KPMG PERFORMED FOR THE FIRST ITEM: TIMELINESS OF FUNCTIONAL ACKNOWLEDGEMENT – EDI.

A. As part of its third party test, KPMG performed a normal volume performance test and a peak volume performance test. The objective of these tests was to evaluate BellSouth's OSS performance associated with ordering at specified volumes. The normal volume performance test evaluated BellSouth's ability to accurately and quickly process orders using the EDI and TAG interfaces under

1 "normal" year-end 2001 projected load conditions. The peak volume
2 performance test evaluated BellSouth's ability to accurately and quickly process
3 orders using the EDI and TAG interfaces under "peak" year-end 2001 projected
4 transaction load conditions. The projected load conditions were based on region-
5 wide load factors, as the electronic interfaces are regional in nature. The results
6 for the TAG interface satisfied the criteria; however, during these two tests,
7 KPMG found that the EDI interface did not return functional acknowledgments in
8 a timely manner for fully mechanized orders (orders that flowed through without
9 manual handling) for Unbundled Network Elements (UNEs) (O&P 3-3-1 and O&P
10 4-3-1). The standard applied by KPMG in the test for the return of functional
11 acknowledgments was 95% of functional acknowledgments received in less than
12 30 minutes.

13
14 Q. YOU REFER TO O&P 3-3-1 AND O&P 4-3-1, PLEASE EXPLAIN WHAT THESE
15 REFER TO.

16
17 A. When KPMG performed its test, it assigned certain criteria using a unique
18 numbering scheme. One of the categories of the test was Ordering &
19 Provisioning, which KPMG identified as O&P in their numbering scheme. A
20 specific test within a category is identified by a specific number. For example,
21 O&P 3-3-1 and O&P 4-3-1 is assigned to a specific test by KPMG. For additional
22 information on the test, see Mr. Pate's testimony.

23
24 Q. WHAT IS A FUNCTIONAL ACKNOWLEDGEMENT IN EDI AND HOW IS IT
25 MEASURED?

1 A. Functional acknowledgments are transmitted between BellSouth and CLECs
2 using EDI for the purpose of notification. The receipt of any EDI transaction by
3 BellSouth or the CLEC requires an acknowledgment. The functional
4 acknowledgment indicates whether a transaction was accepted or rejected. In
5 the case of rejection, the nature of the error is also provided.

6
7 The timeliness of a functional acknowledgment for EDI is measured from the time
8 a document enters the EDI translator software until the functional
9 acknowledgment is transmitted to the CLEC. At the time KPMG performed the
10 normal volume performance and the peak volume performance tests, the
11 infrastructure for EDI limited the turnaround time for functional acknowledgments.
12 Specifically, the EDI architecture utilized by BellSouth's EDI system was only
13 capable of returning batches of data to CLECs within 90 minutes in a peak
14 volume environment at the time of the test. It is also worth noting that, at the time
15 of this test, no benchmark had been adopted by the Georgia Commission.
16 However, BellSouth had set its own internal standard at that time to return 75% of
17 functional acknowledgements within 90 minutes.

18
19 Q. PLEASE DESCRIBE WHETHER EDI FUNCTIONAL ACKNOWLEDGMENTS
20 ARE STILL AN ISSUE.

21
22 A. In January 2001, BellSouth upgraded the infrastructure for EDI in order to
23 shorten the response time capability of the interface. In January 2001, BellSouth
24 upgraded the infrastructure for EDI in order to shorten the response time
25 capability of the interface. For the period March to June 2001, BellSouth

1 returned an average of 96.4% of functional acknowledgements within 30 minutes
2 for the upgraded EDI interface. For each month during this period, the percent
3 returned within 30 minutes 96% or above, with the exception of May, 2001 when
4 the Florida OSS Volume Test caused the overall percent returned in 30 minutes
5 to drop to 90%.

6
7 KPMG also tested the timeliness for functional acknowledgments for EDI during
8 KPMG's functional and production volume tests for orders for UNEs. During
9 these tests, KPMG did receive timely functional acknowledgements, and the
10 evaluation criteria (O&P 1-3-1 and O&P 10-3-1) for these tests were satisfied.
11 This means that the problem that KPMG encountered was limited to the peak
12 volume test. The EDI upgrade has corrected that problem.

13
14 For these reasons, BellSouth believes that the issues raised by these "not
15 satisfied" criteria have been corrected, and that BellSouth's actual performance
16 for functional acknowledgments returned via EDI for CLECs today should not
17 have a material adverse impact on their ability to compete.

18
19 Q. PLEASE DESCRIBE THE NEXT ITEM YOU LISTED: TIMELINESS OF
20 REJECTS AND CLARIFICATIONS – EDI.

21
22 A. As previously stated, KPMG performed functional tests of EDI. One objective of
23 the test was to evaluate the functionality of BellSouth's systems in processing
24 local service requests (LSRs) for UNEs and resale services. Specifically, KPMG
25 tested EDI to determine if this interface returned timely error information (fatal

rejects and auto clarifications) for fully mechanized LSRs, identified as MTP O&P 1-3-2a and STP PO&P 11-3-2a in KPMG's Report. In the test, KPMG required 97% of fully mechanized errors to be received within one hour.

Q. WHAT WERE KPMG'S RESULTS?

A. In the initial test of UNE orders, KPMG received 18% of fully mechanized errors in one hour. During a retest of UNE orders in January 2001, performance improved to 84% of fully mechanized errors received within one hour. In addition, another 5% were received within two hours. For resale services, KPMG's results for the initial test was 9% of fully mechanized errors received in less than one hour. During KPMG's retest of resale services orders in January 2001, KPMG received 85% of the fully mechanized errors within one hour. Another 8%, for a total of 93%, were received within two hours.

Q. WHAT WERE THE RESULTS OF BELL SOUTH'S ANALYSIS?

A. As part of its analysis on these criteria, BellSouth investigated 16 out of 235 orders, 11 for resale services and 5 for UNEs. BellSouth found that, although KPMG was supposed to submit only orders that flowed-through BellSouth's systems in this test, three of the orders fell out for manual handling, therefore delaying the return of the error information. These three orders fell out because KPMG made errors. Another order that KPMG believes it sent could not be located after considerable searching and BellSouth believes this order may not have been sent. According to BellSouth's records, BellSouth returned the error

1 information for one of the other orders within 45 minutes, which is clearly within
2 the one-hour interval. BellSouth found the error information was indeed delayed
3 for three of the sixteen orders because of EDI routing and mapping problems.
4 These EDI routing and mapping problems have been resolved by software
5 changes.

6
7 BellSouth does agree that the remaining eight orders received delayed
8 responses. As discussed previously, in January 2001, BellSouth upgraded EDI
9 enabling it to return fatal rejects and clarifications faster. This upgrade would
10 have allowed four of the eight orders to receive timely responses had KPMG sent
11 them after the upgrade to EDI was completed. Three of the remaining four test
12 responses in this criteria were delayed because of the downstream LEO system.
13 At the time of the test, a few CLECs were making unusual and large queries,
14 which slowed LEO's response times. In March 2001, BellSouth modified LEO so
15 that it now is able to process large queries and send faster responses. The
16 remaining response was delayed because of a LEO outage.

17
18 Given the changes BellSouth has made and the necessary modifications to
19 KPMG's test, the number of orders that would not pass KPMG's test would be
20 much lower today. These improvements are clearly evident in BellSouth's
21 commercial performance results.

22
23 Q. WHAT DOES BELL SOUTH'S COMMERCIAL PERFORMANCE
24 DEMONSTRATE?

1 A. BellSouth's actual commercial performance in this area shows that it is returning
2 error and clarification information to CLECs in a timely manner. For Georgia, in
3 February 2001, BellSouth returned 97.21% of the rejects for resale residential
4 LSRs, 98.28% of the rejects for resale business LSRs, 97.56% of the rejects for
5 "other" LSRs and 100% of the rejects for LNP within one hour, exceeding the
6 benchmark used by KPMG in the test. In April 2001, BellSouth returned 95.15%
7 of the rejects for resale residential LSRs, 100% of the rejects for resale business
8 LSRs and 98.49% of the rejects for loop and port combinations.

9
10 Q. PLEASE DESCRIBE THE NEXT TEST: TIMELINESS OF FIRM ORDER
11 CONFIRMATIONS – TAG.

12
13 A. The next "not satisfied" condition concerns KPMG's functional test of the TAG
14 interface (O&P 2). One area that KPMG evaluated was whether TAG provided
15 timely firm order confirmations (FOCs) for flow-through orders for UNEs (O&P 2-
16 3-3a). The benchmark that KPMG used for this measure is that 95% of FOCs for
17 flow-through orders must be returned within three hours.

18
19 During a retest in January 2001, KPMG tested 45 orders in this category. Of
20 those orders, KPMG received 84% (38 orders) of FOCs for orders submitted via
21 TAG within 3 hours. The seven orders that did not receive FOCs within 3 hours
22 fell out for manual handling. In fact, FOCs for five of these seven orders were
23 received within 24 hours. These seven orders were partially mechanized orders;
24 however, KPMG treated them as fully mechanized orders. The delays in
25 providing FOCs for these orders occurred because they were designed to fall out

1 of the mechanized system for manual handling. These seven orders should have
2 been excluded from this test, as they were not fully mechanized orders and
3 KPMG's benchmark only applied to mechanized orders. Had these seven orders
4 been excluded, 100% of the FOCs for orders submitted in the test would have
5 been received within three hours.

6
7 Q. PLEASE DISCUSS WHETHER FOC TIMELINESS FOR TAG IS STILL AN
8 ISSUE.

9
10 A. Although KPMG did not perform another functional test of TAG, it did perform
11 normal volume, peak volume, and production volume tests of TAG. During these
12 tests, BellSouth returned timely FOCs via TAG. These evaluation criteria (O&P
13 3-3-4, O&P 4-3-4, and O&P 10-3-4) are satisfied in KPMG's report.

14
15 BellSouth's actual commercial performance for CLECs in this area has shown
16 significant improvement, and demonstrates that BellSouth currently is returning
17 FOCs in a timely manner. For Georgia, in April 2001, BellSouth returned 97.50%
18 of the FOCs for resale residential orders, 98.40% of the FOCs for resale
19 business, and 97.12% of the FOCs for UNE combos within three hours, clearly
20 exceeding KPMG's benchmark.

21
22 Q. PLEASE DESCRIBE THE NEXT AREA: ACCURACY AND TIMELINESS OF
23 PARTIALLY MECHANIZED ORDERS.

24
25 A. Orders for certain complex resale services and UNEs may be transmitted

1 electronically via EDI or TAG, but are designed to fall out for manual handling. In
2 order to enable CLECs to submit some complex LSRs electronically, rather than
3 by fax or mail, BellSouth designed the EDI and TAG ordering interface to accept
4 LSRs for these services. After these LSRs are transmitted to BellSouth
5 electronically, they are handled as if they had been faxed or mailed to the Local
6 Carrier Service Center (LCSC). These orders are sometimes referred to as
7 "partially-mechanized." KPMG's report shows 10 "not satisfied" evaluation
8 criteria for tests involving partially mechanized orders. The "not satisfied" criteria
9 for partially mechanized orders can be divided into two areas: accuracy and
10 timeliness. I will discuss both areas.

11
12 Q. PLEASE DESCRIBE HOW PARTIALLY MECHANIZED ORDERS ARE
13 HANDLED.

14
15 A. Partially mechanized orders are processed by service representatives in
16 BellSouth's LCSC, just like manually-submitted orders. The LCSC now consists
17 of three locations due to the volume of orders. For the year 2000, the LCSC
18 processed an average of 99,122 manual and partially mechanized LSRs per
19 month.

20
21 Currently, there are 948 BellSouth employees in the LCSC, including the 780
22 service representatives who process the manual and partially mechanized LSRs.
23 From December 1998 through November 2000, the LCSC increased its trained
24 service representative headcount by 130% to the 780 that are employed today.
25 BellSouth has continuously increased the work force and productivity of the

1 LCSC to meet actual and forecasted demand, increasing complexity of the
2 orders being worked, and tighter processing requirements, such as the
3 benchmarks for returning FOCs, rejects, and clarifications.

4
5 Q. HOW HAS BELL SOUTH ADDRESSED IMPROVEMENT IN THIS AREA?

6
7 A. As a result of the LCSC's growth in personnel, the increased complexity of the
8 orders handled by the LCSC service representatives, and the tighter benchmarks
9 for performance, BellSouth recognized the need to improve the accuracy and
10 timeliness of its handling of partially-mechanized orders. BellSouth has
11 established a group within the LCSC to improve accuracy and timeliness, which
12 is called the "Quality and Accuracy Team" which is now composed of
13 approximately 35 people. The purpose of the team is to support the LCSC in
14 achieving higher levels of accuracy that lead to increased efficiency, improved
15 flow through, increased customer satisfaction, and fewer complaints, expedites,
16 and escalations. For example, the team has helped the LCSC improve the
17 handling of LSRs that drop out for manual handling due to errors. The LCSC
18 monitors the progress of these LSRs using a daily report. From September 1,
19 2000, when the team began its work, to March 28, 2001, there were 92% fewer
20 LSRs on the daily report. Currently, the average number of days it takes to clear
21 them is 4 or less.

22
23 The team identifies problems by closely monitoring the work at the LCSC and
24 looking for trends. If, for example, repeat problems are caused by an LCSC
25 service representative, the representative will be coached by the team. If the

1 problems are caused by a CLEC, the team works with that CLEC's customer
2 service manager who will contact the CLEC and propose corrections.

3
4 Another way to increase accuracy and timeliness for partially mechanized orders
5 is to reduce the amount of manual handling involved in processing them.

6 Although not always practical, the surest solution, of course, is to increase the
7 number of LSRs that flow through the systems rather than fall out for manual
8 handling. With this in mind and as a result of the Georgia Commission's Order of
9 January 12, 2001 in Docket No. 7892-U, BellSouth and the CLECs formed a
10 cooperative "flow through improvement task force." The objective of the task
11 force is to enhance the flow through of electronic orders, document those
12 enhancements, and develop a schedule for implementing the enhancements.
13 The task force is operating as a subcommittee of the Change Control Process
14 (CCP) as discussed in Mr. Pate's initial testimony in this docket. The CLECs and
15 BellSouth first discussed the formation of the task force at the regularly-
16 scheduled monthly status meeting of the CCP on February 28, 2001. The first
17 meeting of the task force occurred on March 19, 2001.

18
19 Q. WHAT DOES BELLSOUTH'S RECENT PERFORMANCE INDICATE
20 REGARDING ACCURACY AND TIMELINESS FOR PARTIALLY-MECHANIZED
21 ORDERS?
22

23 A. According to BellSouth's performance measurements results for Invoice
24 Accuracy, these partially mechanized issues do not have a disproportionate
25 impact on CLEC customers. The invoice accuracy results for Georgia for April
26 2001 were better for CLECs than for BellSouth, yielding 99.75% accuracy.

1 Q. PLEASE DESCRIBE THE NEXT TEST: EXPECTED RESPONSES – ADSL –
2 MANUAL.

3
4 A. KPMG performed a functional evaluation of the pre-ordering and ordering
5 processes for xDSL products as delivered to CLECs through BellSouth's manual
6 processes (PO&P 12). Specifically, KPMG tested BellSouth's ability to provide
7 the expected responses (PO&P 12-2-1). KPMG's standard is that 99% of the
8 expected responses should be received by the CLEC.

9
10 Q. WHAT WERE KPMG'S RESULTS?

11
12 A. Of the 1,006 total transactions that KPMG submitted, 951 (94.5%) received the
13 appropriate responses from BellSouth. Specifically, KPMG submitted 447 pre-
14 order loop makeup service inquiries and LSR service inquiries to BellSouth's
15 Complex Resale Support Group (CRSG) via e-mail. KPMG received 417
16 acknowledgments (93%) for these transactions. In addition, KPMG sent 559
17 total pre-order loop make-up service inquiries and LSR service inquiries via
18 facsimile. Of the 275 loop makeup service inquiries that KPMG submitted via
19 facsimile, 252 (92%) received the subsequent expected responses (confirmation
20 or error) from BellSouth. As a result, KPMG issued Exception 134. For the 284
21 LSR service inquiries that KPMG submitted via facsimile, 282 (99%) received the
22 expected responses (FOCs, rejects, or clarifications), which met KPMG's
23 standard.

24
25 Q. WHAT DID BELL SOUTH FIND REGARDING KPMG'S RESULTS?

1
2 A. In Exception 134, KPMG identified 55 transactions where they did not receive the
3 expected response. BellSouth's investigation of those 55 pre-order loop makeup
4 service inquiries and order LSR service inquiries that KPMG claimed did not
5 receive the expected responses is as follows:

- 6
- 7 • Three of the inquiries, purchase order numbers X1P16, X002A10019, and
8 X031A10117, were acknowledged.
 - 9 • One transaction was recalled before BellSouth could do anything with it.
 - 10 • Twenty-two of the inquiries were rejected. Because KPMG should have
11 considered a rejection to be an acknowledgment that BellSouth received
12 the inquiry, KPMG should not have expected additional acknowledgments
13 for the 22 transactions that BellSouth rejected. BellSouth believes that it
14 handled these 22 transactions correctly. Nevertheless, on March 22,
15 2001, BellSouth changed its process. Now when BellSouth sends an e-
16 mail rejection, it also states that it is acknowledging the inquiry.
 - 17 • Four inquiries, that KPMG state were not acknowledged, according to
18 BellSouth's records were never received by BellSouth.
 - 19 • On six inquiries KPMG erroneously expected a FOC. BellSouth disagreed
20 because these orders were rejected back to KPMG. Because KPMG did
21 not resolve these errors and return the orders to BellSouth, KPMG should
22 not have expected FOCs. BellSouth believes that it handled these 6
23 inquiries correctly.
 - 24 • Two of the loop makeup service inquiries where expected FOCs were never
25 received by BellSouth according to BellSouth records.

- 1 • Two loop makeup service inquiries were labeled "version 01." When a
2 CLEC issues an LSR, the CLEC assigns a Purchase Order Number
3 (PON). If the LSR must be modified, the CLEC will simply increment the
4 version number instead of issuing a new PON. BellSouth's records show
5 that it did not receive these, although KPMG may have sent them as
6 "version 00."
- 7 • BellSouth investigated 13 loop makeup service inquiries for which KPMG
8 received the makeup information, but no prior FOC from the LCSC. On 12
9 inquiries BellSouth erroneously sent the loop makeup information to
10 KPMG before the LCSC sent the corresponding FOCs. 1 loop makeup
11 service inquiry was cancelled by the LCSC because the LCSC returned
12 the related LSR to KPMG for clarification. Because KPMG had not
13 resolved the problems with the LSR in a timely manner, the LCSC properly
14 canceled it. This process is outlined in the LEO Guide, volume 1. On
15 February 5, 2001, BellSouth changed its process whereby the loop
16 makeup information is not sent to a CLEC until after the FOC has been
17 generated. This resolved the issues encountered in handling these
18 orders.
- 19 • Finally, KPMG believed that 2 LSR service inquiries should have received
20 subsequent responses (FOCs, clarifications, or rejects) from BellSouth.
21 BellSouth disagreed because it sent KPMG a clarification for one LSR
22 service inquiry. As discussed above, because KPMG should have
23 considered a clarification to be an acknowledgment that BellSouth
24 received the inquiry, KPMG should not have expected an acknowledgment
25 for this inquiry. BellSouth's records show that it did not receive the other

1 LSR service inquiry, although KPMG may have sent it with a different
2 version number.

3
4 Q. WHAT DOES BELLSOUTH'S ANALYSIS INDICATE?

5
6 A. After analyzing these 55 transactions, BellSouth believes that only 12
7 transactions, the 12 inquiries for which the CRSG sent the loop makeup
8 information to KPMG before the LCSC sent the corresponding FOCs, did not
9 receive the expected responses. Therefore, 98.81% of the transactions received
10 the expected responses, which is very slightly below KPMG's standard. In
11 addition, BellSouth believes that the changes and modifications it has made for
12 handling the responses to these inquiries should prevent any material adverse
13 impact on competition.

14
15 Q. TURNING TO THE "NOT COMPLETE" CRITERIA FROM KPMG'S TEST, WHAT
16 DOES YOUR TESTIMONY ADDRESS?

17
18 A. I will address the criteria labeled as "not complete" by KPMG. All of these criteria
19 were in the part of the test dealing with performance measurements.

20
21 Q. WHAT ARE "NOT COMPLETE" CRITERIA?

22
23 A. A "not complete" occurred, when the third party test was closed, but some test
24 criteria had not been completed by KPMG. Work continues on those criteria and

1 KPMG is expected to issue a supplemental report indicating whether these
2 remaining criteria were satisfied.

3
4 Q. PLEASE DESCRIBE THE FIRST THREE “NOT COMPLETE” CRITERIA THAT
5 YOU ADDRESS: PERCENT REJECTED SERVICE REQUESTS, REJECT
6 INTERVALS AND FIRM ORDER CONFIRMATION TIMELINESS.

7
8 A. The first set of “not complete” conditions concern the Ordering and Provisioning
9 Performance Measures Evaluation (O&P – 7). This evaluation provided for “(1)
10 Calculation and Reporting Validation, and (2) Data Comparison, for ordering and
11 provisioning-related Service Quality Measures (SQMs) produced by BellSouth.”

12
13 For O&P 7-1-3 (Percent Rejected Service Requests), O&P 7-2-3 (Reject
14 Interval), and O&P 7-3-3 (Firm Order Confirmation Timeliness), KPMG compared
15 Hewlett Packard-provided data to the corresponding BellSouth raw data for the
16 months of August 2000 – November 2000. KPMG found discrepancies in time
17 stamps for LSRs Sent/Received, Reject/Clarification Requested, and FOC for the
18 TAG and EDI interfaces and issued Draft Exceptions 176 and 178 to BellSouth.

19
20 Draft Exception 176 identified six discrepancies for the EDI interface. BellSouth
21 responded to the exception on March 12, 2001:

- 22
23 • Two discrepancies were due to incorrect test procedures on the part of
24 KPMG.

- Four discrepancies were unresolved, as information identifying the causes of the delays was no longer available. Because of this, BellSouth requested KPMG to test the most recent month's data.

Draft Exception 178, based on October 2000 and November 2000 data, identified a total of nineteen discrepancies for the EDI and TAG interfaces. BellSouth responded to the exception on March 23, 2001 as follows:

- Eleven discrepancies were due to incorrect test procedures on the part of KPMG. For example, KPMG sent multiple instances of the same PON/version combination. Only one instance is permitted. Another example was where KPMG was not available to resolve the data when BellSouth had it ready, but KPMG recorded the time when they received it.
- Three discrepancies were due to errors in BellSouth data. BellSouth was not accurately capturing the timestamp when FOCs were sent manually. Corrective measures were implemented in January 2001.
- Five discrepancies were unresolved, as information identifying the causes of the delays was no longer available.

For each case where historical information was available for analysis, BellSouth either found no discrepancies in time stamps, or implemented corrective measures to address the issues.

1 Q. CAN YOU EXPLAIN THE PROCESS FOR RESPONDING TO THE OCTOBER
2 2000 DATA?

3
4 A. Data is not available until some time after the end of the data month. KPMG first
5 must assimilate and review the data to determine if a problem occurred. If so,
6 KPMG will issue an observation. If KPMG believes a problem exists, it will issue
7 a Draft Exception and allow BellSouth time to review the process and/or data to
8 determine the cause and take corrective action. In many instances, BellSouth
9 and KPMG can resolve the issue and the Draft Exception will be closed.
10 However, in some instances, KPMG and BellSouth may disagree on the
11 resolution. If so, KPMG will file the Exception with the GPSC and BellSouth will
12 simultaneously file a response to the Exception with the GPSC. If, at a later
13 time, KPMG agrees with and/or accepts BellSouth's response, KPMG will amend
14 the Exception filed with the GPSC. In some instances this process can be
15 resolved more quickly than others.

16
17 Q. PLEASE DESCRIBE THE "NOT COMPLETE" CRITERIA FOR THE TWO
18 MEASURES: AVERAGE JEOPARDY NOTICE INTERVAL AND PERCENTAGE
19 OF ORDERS GIVEN JEOPARDY NOTICES (O&P 7-6-3).

20
21 A. This set of "not complete" conditions concern O&P 7-6-3 (Average Jeopardy
22 Notice Interval and Percentage of Orders Given Jeopardy Notices). In this test,
23 KPMG issued Exception 128 for one service order in the month of October 2000,
24 where the KPMG-collected value for "completion date" did not match the
25 BellSouth-reported value. BellSouth submitted a response to this exception on

1 March 13, 2001. The above test is now satisfied for P 7-6-3, Average Jeopardy
2 Notice Interval and Percent of Orders Given Jeopardy Notices.

3
4 At the time of issue of the MTP final report, KPMG Consulting was unable to
5 match the BellSouth-reported completion date to the KPMG Consulting-recorded
6 completion date for a single Purchase Order Number (PON)/Service Order in
7 October 2000.

8
9 BellSouth addressed this discrepancy by indicating that the completion date in
10 KPMG Consulting's records was correct, and had been incorrectly excluded from
11 BellSouth's records. BellSouth instituted a system modification to ensure that this
12 would not reoccur in future months.

13
14 KPMG Consulting retested this criterion using both KPMG Consulting collected
15 data and BellSouth reported data for November 2000 through February 2001.
16 KPMG found that all of the KPMG Consulting collected data matched the
17 corresponding BellSouth provided data. As a result, the Exception was closed.
18 See the Closure Report for Exception 128 for additional information on this issue.
19 As stated above, KPMG considers this test complete.

20
21 Q. WHAT WAS THE OBJECTIVE OF THE NEXT SECTION OF NOT COMPLETE
22 CRITERIA: DATA COLLECTION AND STORAGE VERIFICATION AND
23 VALIDATION REVIEW (PMR 1)?
24

1 A. This "not complete" determination concerns the Data Collection and Storage
2 Verification and Validation Review (PMR 1). The objective of this review was to
3 evaluate the key policies and procedures for collecting and storing both the raw
4 data that BellSouth uses to create SQM reports and the preliminary data that
5 BellSouth uses to produce the raw data.

6
7 Q. PLEASE DESCRIBE KPMG'S ASSERTION THAT BELL SOUTH DID NOT
8 PROVIDE SUFFICIENT DATA FOR CREATING HISTORICAL SQM REPORTS.

9
10 A. This "not complete" determination is identified as PMR 1-2-1 in the Report.
11 KPMG reported that BellSouth did not provide sufficient data for re-creating any
12 prior month's historical SQM report. It suggested that the raw data, early-stage
13 data, and the SQM reports be retained for a sufficient length of time to support
14 any audits that might be required by the GPSC. KPMG reported its findings in
15 Exception 79.

16
17 Q. WHAT WAS BELL SOUTH'S RESPONSE TO KPMG'S FINDINGS?

18
19 A. BellSouth provided its latest response to this exception on March 6, 2001, in
20 which it proposed the following data retention policy:

21 "It is the policy of BellSouth Performance Measurements to retain the
22 early-stage data for a period of eighteen months to facilitate detailed
23 audits of PMAP reports. 'Early-stage data' is defined as that which is
24 extracted from source systems (CABS, CRIS, EXACT, WFA, SOCS,
25 LMOS, etc.) and maintained as ASCII flat files for the purpose of

1 generating SQM reports. 'Early-stage' data is further defined as source
2 system data that is transmitted manually for said purpose. The
3 mechanical flat files and the manual files of early-stage data will be
4 retained for a period of eighteen months."

5
6 "BellSouth will retain PMAP raw data for a minimum of three years.
7 'PMAP raw data' is defined as that which is available for download for the
8 current month from the BellSouth website. Further, BellSouth will retain
9 for three years the monthly aggregate database, i.e., that which has been
10 processed and normalized from raw data, and the resources necessary to
11 re-create the SQM reports from that database."

12
13 BellSouth believes that implementation of this policy, combined with current data
14 retention practices, allows a full and complete opportunity to audit BellSouth's
15 performance results in a meaningful way.

16
17 BellSouth is currently implementing its new data retention policies, as outlined in
18 its most recent amended response to this exception. It is anticipated that these
19 policies will be fully implemented by the end of the third quarter of 2001. KPMG
20 Consulting will continue to monitor their implementation.

21
22 Q. PLEASE DESCRIBE THE NEXT AREA WHERE TEST RESULTS ARE NOT
23 COMPLETE: METRICS DEFINITION DOCUMENTATION AND
24 IMPLEMENTATION VERIFICATION AND VALIDATION REVIEW (PMR 2).
25

1 A. KPMG had determined that the Metrics Definition Documentation and
2 Implementation Verification and Validation Review (PMR 2) was “not complete.”
3 This review evaluated the definitions of the SQMs and the associated
4 descriptions of the calculations in the October 22, 1999, version of BellSouth's
5 Georgia SQM documentation.

6
7 Q. WHAT WAS THE FIRST SET OF FINDINGS UNDER PMR 2?

8
9 A. The first group of findings was identified as PMR 2-2-3, 2-2-4, 2-21-3 and 2-21-4.
10 As noted in Exception 133, KPMG found that BellSouth did not compute its OSS
11 Interface Availability SQM in accordance with the definitions and business rules
12 that appear in the *Service Quality Measurements Georgia Performance Reports*
13 *(SQM Reports)* for Pre-Ordering and Maintenance and Repair.

14
15 BellSouth implemented modifications to the OSS Interface Availability calculation
16 and KPMG Consulting then confirmed both the presence and completeness of
17 these new processes, as well as the appropriateness of the new wording in
18 BellSouth's updated SQM manual, in February 2001. KPMG issued Closure
19 Report for Exception 133 and subsequently determined that these tests were
20 'satisfied.'

21
22 Q. PLEASE EXPLAIN THE OTHER GROUP OF “NOT COMPLETE” CRITERIA
23 UNDER PMR 2.

24
25 A. The next criteria are identified as PMR 2-4-2, 2-4-3, 2-5-2 and 2-5-3. In
26 Exception 122, KPMG stated that "Definitions and Business Rules in the *Service*

1 *Quality Measurements Georgia Performance Reports (SQM Reports) are*
2 incomplete or inaccurate for the FOC Timeliness and Reject Interval Ordering
3 Service Quality Measurements."

4
5 KPMG found that time stamps from the LEO system are used for FOC
6 Timeliness and Reject Interval Measurements rather than acquiring the time
7 stamps from EDI, LENS, and TAG as the business rules in the SQM stated.

8
9 Program changes have been scheduled that will enable BellSouth to capture
10 time stamps from EDI, LENS, and TAG for calculation of the FOC and reject
11 intervals. Even though the time stamps will be moved and the responses will
12 take longer, BellSouth expects to meet the performance benchmark.

13
14 Q. PLEASE DESCRIBE THE INITIAL CONCLUSIONS REGARDING METRIC
15 DATA INTEGRITY VERIFICATION AND VALIDATION REVIEW (PMR 4) IN THE
16 KPMG REPORT.

17
18 A. KPMG had found the Metrics Data Integrity Verification and Validation Review
19 (PMR 4) to be "not complete." This review evaluated the accuracy and
20 completeness of the SQM raw data produced by BellSouth during recent months.
21 The evaluation also assessed the adequacy and completeness of the related
22 data transfer process and the internal controls on the processes.

23
24 Q. For PMR 4-1-1, KPMG STATED THAT THE RAW DATA USED IN THE
25 CALCULATION OF BELL SOUTH SQM REPORTS ARE NOT ACCURATELY

1 DERIVED FROM OR SUPPORTED BY THEIR COMPONENT EARLY-STAGE
2 DATA. CAN YOU EXPLAIN THESE DISCREPANCIES?

3
4 A. Yes. One "not complete" criterion is identified as PMR 4-1-1 in the Report. In
5 Exception 89.3, KPMG stated that "raw data used in the calculation of BellSouth
6 SQM reports are not accurately derived from or supported by their component
7 early-stage data" for OSS Response Interval – Pre-Ordering.

8
9 BellSouth provided an amended response to this exception on February 23,
10 2001. It was determined that the discrepancies were due to invalid negative
11 numbers generated by some of the 'middleware' applications used by LENS,
12 TAG, RNS, and ROS. Source system teams are currently working to correct or
13 eliminate these invalid values. BellSouth estimates that implementation of the
14 required changes will be completed by third-quarter 2001. Specifics follow.

15
16 -BellSouth has provided the LENS data to KPMG and they have validated
17 that the data does not have any negative values. KPMG is satisfied that
18 the changes have been correctly made in LENS.

19
20 -The changes have also been made in RNS and ROS and we will provide
21 the data to KPMG by 07/27/01.

22
23 -TAG is scheduled for modifications October 1, 2001.
24

1 Although BellSouth does not dispute these discrepancies, the magnitude of the
2 effect is less than one tenth of one percent. Details are in the table below.

3

Discrepancy Grouping	<u>Difference</u>
Total Number of Accesses	0.021%
Total Access Time in <u>Milliseconds</u>	0.060%
Total Number of Access > Six Seconds	0.068%

4
5 The small differences reflected in the above table should not have a material
6 impact on competitors or competition.

7
8 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON THE
9 NEXT SET OF NOT COMPLETE CRITERIA UNDER PMR 4?

10
11 A. These tests are identified as PMR 4-3-1, 4-3-2, 4-4-1, 4-4-2, 4-5-1 and 4-5-2 in
12 the KPMG Final Report. KPMG stated in Exception 131 that "BellSouth's raw
13 data used in the calculation of the BellSouth Ordering SQM reports is not
14 accurately derived from or supported by its component early-stage data" for
15 Percent Rejected Service Requests, Reject Interval, and FOC Timeliness.

16
17 KPMG has prepared a Closure Report for Exception 131 and these tests have
18 been satisfied.

19
20 Details for this test follow.

- PMR 4-3-1 - *Ordering – Percent Rejected Service Requests* – At the time the Supplemental Test Plan (STP) final report was issued, KPMG Consulting could not match one early stage value to the corresponding raw data value for each of the LON and LEO systems, using October 2000 data.

- For the LEO record, the early stage data showed that a FOC had been sent, but the BellSouth raw data reported a reject interval. This PON was erroneously placed in auto clarification by LESOG. A change request was implemented to correct the cause of this erroneous auto clarification such that the Local Service Request (LSR) was processed, and the PON was subsequently FOC'd.

- For the LON record, the early stage data validated the rejection interval for a given PON. However it also reported an FOC date. BellSouth reported that in LON, a sales representative manually updates the version field. As a result, the PON in question was not updated to reflect the current version.

For both of these records, KPMG Consulting accepted BellSouth's explanations as reasonable. KPMG has prepared a Closure Report for Exception 131 and it is pending approval by the GA PSC.

- PMR 4-3-2 – *Ordering – Percent Rejected Service Requests* – As of the date that the STP final report was issued, KPMG Consulting could not find 18 out of 25 early stage LON (October 2000) records. After research, BellSouth explained seventeen of these discrepancies as being placed in

1 states other than Georgia. BellSouth represented that the remaining
2 missing record had a received date in November 2000, and thus should
3 not be found in the October 2000 raw data files. Additionally, this order
4 was subsequently cancelled, and thus would not be found in the
5 November 2000 data files.

6
7 KPMG Consulting accepted BellSouth's explanations as reasonable.
8 KPMG drafted a Closure Report for Exception 131 which is pending
9 approval by the GA PSC.

- 10
- 11 • PMR 4-4-1 - *Ordering – Reject Interval* – See PMR 4-3-1 above.
 - 12
 - 13 • PMR 4-4-2 - *Ordering – Reject Interval* – See PMR 4-3-2 above.
 - 14
 - 15 • PMR 4-5-1 - *Ordering – Firm Order Confirmation Timeliness* – As of the date
16 that the STP final report was issued, KPMG Consulting found that for three
17 October 2000 LON orders, the KPMG Consulting-calculated FOC duration did
18 not match the corresponding BellSouth-reported value in the raw data files.

19
20 BellSouth explained one discrepancy by providing the details of weekend
21 hours that should be excluded from the duration calculation. (This information
22 is now detailed in both the *Service Quality Measurements* manual as well as
23 the *Raw Data User Manual*.) The other two LEO orders were partially
24 mechanized, and thus BellSouth used the LEO timestamps for calculating the
25 FOC duration.

1
2 KPMG Consulting accepted BellSouth's explanations as reasonable.
3 KPMG drafted a Closure Report for Exception 131 which is pending
4 approval by the GA PSC.
5

- 6 • PMR 4-5-2 - *Ordering – Firm Order Confirmation Timeliness* – See PMR
7 4-3-2 above.
8

9 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON ITEM
10 PMR 4-13-1?
11

12 A. KPMG could not replicate the BellSouth-reported SQMs for Percent Provisioning
13 Troubles within 30 Days of Service Order Activity, as stated in Exception 86.1.
14 Therefore, it could not validate the accuracy and completeness of the associated
15 raw data, as defined by PMR 4-13-1. Upon successful closure of Exception 86.1,
16 KPMG will reevaluate this test criterion.
17

18 BellSouth is currently working to correct the irregularities associated with Percent
19 Provisioning Troubles within 30 Days of Service Order Activity in PMAP. KPMG
20 successfully replicated November 2000 and December 2000 data by simulating
21 the programming changes. Retesting will be conducted once the changes are
22 implemented.
23

24 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON PMR
25 4-38-1 AND 4-39-1?

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A. This test was described in Exception 89.2. In this Exception, KPMG noted a discrepancy between some of the raw data used in the Trunk Group Service Report and the Trunk Group Service Detail report and the early stage data.

Following some programming modifications, KPMG Consulting retested using January 2001 data, and found that the raw data and early stage data agreed. See Exception 89 for additional information on this issue.

All the above test criteria have been moved to Satisfied

Q. PLEASE DESCRIBE THE LAST AREA: CALCULATION AND REPORTING VERIFICATION AND VALIDATION REVIEW (PMR 5) WHERE “NOT COMPLETE” CRITERIA REMAIN.

A. The last set of “not complete” criteria involves the Calculation and Reporting Verification and Validation Review (PMR 5). This review evaluated the accuracy of the information produced by BellSouth's SQM report production processes. In this evaluation, KPMG determined whether BellSouth's SQM calculations were accurately reported for the aggregate of all CLECs and for BellSouth retail in October 1999. KPMG based its evaluations on the raw data and computation instructions provided by BellSouth. This evaluation complemented the related Performance Measures Evaluation conducted under the *Master Test Plan*, which focused on the SQMs reported for the KPMG test CLEC for all months of the transaction-testing period.

1
2 Q. WHAT WERE KPMG'S COMMENTS AND BELL SOUTH'S RESPONSE IN THIS
3 AREA?

4
5 A. Of the items tested, PMR 5-11-2 was declared Not Complete in KPMG's Report.
6 KPMG stated in Exception 86.1 that it could not replicate "BellSouth's reported
7 SQMs." This included Percent Provisioning Troubles within 30 days of Service
8 Order Activity in the provisioning non-trunks category for the CLEC Aggregate
9 and BellSouth Retail.

10
11 BellSouth is currently working to correct the irregularities associated with Percent
12 Provisioning Troubles within 30 Days of Service Order Activity. KPMG
13 successfully replicated November 2000 and December 2000 data by simulating
14 the programming changes. Retesting will be conducted once the changes are
15 implemented.

16
17 Q. PLEASE DESCRIBE THE STATISTICAL EVALUATION OF TRANSACTIONS
18 TEST METRICS INCLUDED IN THE KPMG SUPPLEMENTAL TEST REPORT.

19
20 A. Section F of the Supplemental Test Plan Final Report addresses KPMG's test to
21 evaluate BellSouth's service performance for KPMG's test CLEC using statistical
22 methods to compare BellSouth's performance for CLECs' standards established
23 in July 2000 by the Georgia PSC. The actual data tested was for the months of
24 December 1999 and January – February 2000. It is important to note that the
25 standards were set about six months after the testing was conducted and the

1 data was collected. As a result, not surprisingly, this comparison revealed issues
2 that have been addressed and corrected over time. Details follow.

3
4 Table VIII-6.1 in Section F.2.3 of the Report provides a Test Cross-Reference for
5 the criteria used in the metrics evaluation with Table VIII-6.3 in Section F.3.1
6 providing the result and comments for that evaluation. My comments will
7 address the sections that are listed with "Not Satisfied" results. Table VIII-6.4 of
8 the Report provides the Detail of Results for Resale criteria. Table VIII-6.5
9 shows the Detail of Results for UNE evaluation. Table VIII-6.6 provides the Detail
10 of Results (Other). I will refer to the appropriate item number of each section
11 from the report with my comments.

12
13 KPMG listed their results in 10 groupings: a) 6-1-1 to 6-1-4 (4 groups); b) 6-2-1
14 to 6-2-4 (4 groups); c) 6-3-1 to 6-3-2 (2 groups). Test 6-3-2 was noted as not
15 complete. KPMG established their own criteria that 90% of the individual tests
16 would have to meet or exceed the standards effective in Georgia in July 2000 to
17 receive a satisfied for the test section. Even with the retroactive application of
18 the July 2000 standards, BellSouth successfully satisfied five (5) of the nine (9)
19 completed categories that have been reported. The five categories that
20 BellSouth received a satisfied rating were: 1) Resale – Ordering; 2) Resale -
21 Maintenance & Repair; 3) Resale – Billing; 4) UNE – Maintenance & Repair, and
22 5) UNE - Billing.

23
24 The following paragraphs will demonstrate that BellSouth significantly has
25 improved its overall performance in the remaining four categories (PMR 6-1-2, 6-

2-1, 6-2-2, and 6-3-1) since the evaluations were conducted over a year ago. These four categories are currently designated as “not complete” in KPMG’s report. As a result, the previous findings of KPMG should not significantly impact a CLEC’s ability to compete.

Q. PLEASE DESCRIBE THE RESALE – PROVISIONING (PMR 6-1-2) COMPARISON INCLUDED WITH THIS REVIEW.

A. For Category PMR 6-1-2, 14 of the 28 tests were listed as Below the Standard. The 14 items are as follows:

- Items 10, 11, and 13 – These criteria evaluated the Order Completion Interval for Residence Resale in the Non-Dispatch category. BellSouth has determined that these orders were receiving a dispatch interval, instead of the non-dispatch interval they should have received. This is being addressed in a future system update and BellSouth will assess the impact of this update. Prior to the system update being implemented, the majority of these orders were being handled with a manual work-around. March 2001 data for Georgia showed a significant improvement to a two (2) day average for the CLECs compared with a one (1) day for BellSouth.
- Items 15 – 20 compared the Average Jeopardy Notice Interval for Residence and Business Resale to a benchmark of greater than or equal to 48 hours. BellSouth is currently meeting this benchmark in Georgia for March 2001 for all Residence and Business Resale orders.

- 1
- 2
- Items 24 – 26 compared the percent jeopardies for Residence Resale to
- 3 the BellSouth Residence and Business analog from the July 2000 Order.
- 4 BellSouth currently is meeting this measurement in Georgia for March
- 5 2001 with the percentage of Residence orders receiving jeopardies at
- 6 0.62% compared with the BellSouth retail analog of 1.32%. Thus, the
- 7 TRA should rely on actual commercial usage.
- 8

- 9
- Item 29 is for Residence Resale Dispatch Missed Installation
- 10 Appointments. BellSouth currently is meeting this measurement in
- 11 Georgia for March 2001 with the percentage of Residence Resale Missed
- 12 Appointments at 5.69% compared with BellSouth retail analog of 12.16%.
- 13

- 14
- Item 30 compared the Residence Resale Non Dispatched Missed
- 15 Installation Appointments for the test CLEC in January 2000 with the July
- 16 2000 retail analog. While there was only one (1) missed test CLEC order
- 17 out of 14, the statistical score showed an out of parity condition as a result
- 18 of the low volume of CLEC orders. In March 2001, in Georgia the
- 19 comparison was 0.09% for CLEC aggregate and 0.02% for BellSouth. In
- 20 other words, BellSouth successfully completed over 99.9% of the
- 21 scheduled orders for all CLECs and BellSouth retail in this category.
- 22

23 Q. PLEASE DESCRIBE THE RESULTS FOR THE UNE – ORDERING

24 COMPARISON (6-2-1) FROM THIS REPORT.

25

A. For Category PMR 6-2-1, the items in this category with unsatisfactory results (2, 4, 6-9, 16, 17, 19, and 21) were in the Partially Mechanized category. Since February 2000, BellSouth has taken action to improve its performance in this area in order to improve the timeliness and meet the benchmarks of 85% within 24 hours for the average reject interval and 85% within 36 hours for FOC that was used by KPMG. The following Georgia data for March 2001 shows that BellSouth is meeting KPMG's benchmark for all of these test items.

Reject Interval

<u>Item</u>	<u>Product</u>	<u>March 2001 Data</u>
2	2W Analog Loop-Design	96.34%
4	2W Analog Loop Non-design	No orders
6	Loop + Port Combo	98.32%
7	Switch Ports	No Orders
8	2W Analog INP Loop-Design	No Orders
9	2W Analog INP Loop-Non-Design	No Orders

Firm Order Confirmation

16	2W Analog Loop-Design	98.19%
17	2W Analog Loop Non-design	100%
19	Loop + Port Combo	98.95%
21	Switch Ports	No Orders

Q. PLEASE DESCRIBE THE UNE – PROVISIONING (PMR 6-2-2) COMPARISON INCLUDED WITH THIS REVIEW.

1 A. For category PMR 6-2-2, KPMG determined that the following items did not meet
2 their criteria:

- 3
- 4 ■ Items 22, 23, 25, 26 are OCI comparisons for Non Dispatched orders. A root
5 cause analysis for OCI for Non-Dispatch orders revealed that BellSouth was
6 offering a 0 to 2-day interval on retail non-dispatched POTS orders, but the
7 UNE combination loop and port non-dispatched orders were receiving the
8 same interval as “dispatched” orders. On February 28, 2001, an Interim
9 solution was added to the ordering system that will provide one-day intervals
10 for non-dispatched UNE Combo (Loop & Port) orders for those CLECs placing
11 LSRs through the latest version (Version 9) of the ordering system. Because
12 all CLECs have not converted to Version 9 and because there were orders
13 already pending at the time this solution was implemented, only a partial
14 impact is reflected in the March data. The permanent solution for this
15 problem, a modification to the due date calculation process, was implemented
16 on June 2, 2001 and BellSouth currently is assessing the impact of the system
17 update.

18

19 In addition to the appointment interval issue, OCI is adversely affected by
20 LSRs for which CLECs request intervals beyond the offered interval and do
21 not enter an “L” code on the order. When a CLEC requests an interval
22 beyond the interval offered by BellSouth, the CLEC should enter an “L” code
23 on the LSR. “L” coded orders are excluded from the OCI metrics. Prior to
24 March, a detailed review of this process indicated that many extended interval
25 orders did not have an “L” code on them and, thus, were being counted in the

OCI interval. On February 24, 2001, BellSouth began to add the "L" code to all electronic orders for which a CLEC requested an extended interval but did not have the appropriate code on the LSR.

The overall order completion interval for Combo (Loop & Port) non-dispatched orders in Georgia in March 2001 is 2.63 days. BellSouth has analyzed March data for this sub-metric by (1) excluding orders that were submitted prior to March 1 and (2) including orders that were submitted via Version 9 of the ordering system. This analysis was done to reflect the full impact of the due date calculator interim solution. 5,669 orders were submitted and completed in March and were processed utilizing the interim solution. For these orders, the average OCI was 1.02 days. Based on these results, BellSouth is confident that the software modifications being made should have a positive impact on the results in this sub-metric.

- Items 31 and 40 compare the percent jeopardies for loop and port combinations and analog loops to the BellSouth residence and business analog from the July 2000 Order. The loop and port combinations met the specified analog in Georgia in March 2001 with the percent jeopardies for the CLEC aggregate at 0.53% compared with the BellSouth retail analog of 1.47%.
- Items 42 - 52 compared the Average Jeopardy Notice Interval for loop and port combinations, switch ports, and analog loops to a benchmark of

1 greater than or equal to 48 hours. BellSouth currently is meeting this
2 benchmark for March 2001 for all orders except one in these categories.

- 3
- 4 ■ Items 53 – 60 are for Missed Installation Appointments for Non-Dispatch
5 orders in the loop and port combinations / switch port areas. In Georgia in
6 March 2001, the comparison was 0.11% for CLEC aggregate and 0.03%
7 for BellSouth. In other words, BellSouth successfully completed over
8 99.9% of the scheduled orders for all CLECs and BellSouth retail in this
9 category.

10

The following Georgia March 2001 data shows BellSouth is meeting parity for the majority of these test items.

Order Completion Interval

<u>Item</u>	<u>Product</u>	<u>March 2001 Data</u>
22/23/25	Loop + Port Combo-Non-Design	2.63 CLEC / 1.01 BST
26	Switch Ports Non-Design	No Orders

Jeopardy

31	Loop + Port Combo	0.53% CLEC / 1.47% BST
40	2W Analog Loop Non-Design	10.56% CLEC / 2.46% BST

Jeopardy Notice Interval

42/43	Loop + Port Combo	100%> 48 Hours
44-46	Switch Ports	No Orders
47/48	UNE Other Non-Design	No Orders
49/50	2W Analog Loop Design	100%> 48 Hours
51/52	2W Analog Loop Non-Design	100%> 48 Hours

Missed Installation Appointments

53/56/59	Loop + Port Combo Non-Design	0.11% CLEC/0.03%BST
54/57/60	Switch Ports Non-Design	No Orders

1 Q. PLEASE DESCRIBE THE RESULTS FOR THE OTHER (BILLING) (PMR 6-3-1)
2 COMPARISON FROM THIS REPORT.

3
4 A. Item 1 compared the Usage Data Delivery Completeness for the test CLEC to
5 the regional results for BellSouth. This measure tracks the percentage of usage
6 data delivered within thirty days for both BST retail and the CLEC aggregate.
7 The January 2000 results show a 1% difference: The test CLEC's Usage Data
8 Delivery Completeness was 99% and BellSouth Retail was 100%. A similar
9 difference existed in the February 2000 data but due to the smaller sample size,
10 it was given an 'At Standard' rating. In March 2001, the CLEC aggregate results
11 exceeded the BellSouth retail analog with a 99.5% for the CLEC and 99.2% for
12 the BellSouth analog.

13
14 Items 4 – 6 compared the timeliness of the data delivery. This measure tracks the
15 percentage of usage data delivered within six days for both BST retail and the CLEC
16 aggregate. While the CLEC measurement shows less than the fixed critical value, it is
17 only 1% less than the BST retail value. Both measurements show greater than 97.5%
18 delivery timeliness. This provides the CLECs a meaningful opportunity to compete. In
19 exchanging data between local providers for meet point billing and third party billing of
20 end user's calls, a benchmark of 95% is generally used in the industry to measure
21 performance.

22
23 Items 7 and 8 compare the average interval for that delivery. March 2001 shows
24 that BellSouth met the performance standard for both the CLECs and the retail
25 analogue.

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<u>Item</u>	<u>SQM</u>	<u>February 2001 Data</u>
1	Usage Data Delivery Comp	99.49% CLEC / 99.20% BST
4/5/6	Usage Data Delivery Time	97.64% CLEC / 98.66% BST
7/8	Mean Time to Deliver Usage	3.53 day CLEC / 3.51 day BST

Q. WHAT WOULD BE THE STATUS OF THESE TESTS IF THEY USED MARCH 2001 DATA AS THE COMPARISONS?

A. If all of these tests were rerun with March 2001 data from Georgia as the basis for the results, 37 of the 53 Below Standard tests would be considered At Standard. Those 37 tests would have satisfied the Resale Provisioning (PMR 6-1-2) and UNE Ordering (PMR 6-2-1) sections. Of the remaining 16 tests, 7 would be satisfied with the OCI change to the due date calculator and “L” coding on June 2, 2001. These changes would satisfy the UNE Provisioning (PMR 6-2-2) criteria. The Billing section (PMR 6-3-1) would be satisfied with the changes listed above.

Q. WITH REGARD TO THE KPMG TEST, WHAT DOES YOUR TESTIMONY DEMONSTRATE?

A. BellSouth believes that the KPMG third party test combined with BellSouth’s actual performance data and the modifications to its systems and processes made in connection with the test confirms that BellSouth is providing satisfactory OSS performance. BellSouth passed 98% of the criteria that KPMG tested.

1 Much of the relatively small amount of deficiencies identified in the test has been
2 offset by actual commercial usage. In addition, BellSouth has taken the
3 necessary actions to improve performance in those areas where results were
4 unsatisfactory. BellSouth's recent actual performance, as reflected in its
5 performance reports, shows that BellSouth is currently meeting a very high
6 percentage of the benchmarks and standards adopted by the Georgia
7 Commission on these issues.

8
9 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

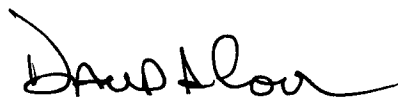
10
11 A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David A. Coon –Director – Interconnection Services, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 44 pages and 0 exhibit(s).



David A. Coon

Sworn to and subscribed
before me on July 31, 2001


NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005